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Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff,

Plaintiff,

v.

NORMA SHAPIRO, individually and in her capacity as Trustee for the Norma Shapiro Revocable Declaration of Trust Under Agreement Dated 9/16/2008 and the Trust Under Will of Philip L. Shapiro; NORMA SHAPIRO DECLARATION OF TRUST UNDER AGREEMENT DATED 9/16/2008,

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04486 (SMB)

REVOCABLE TRUST; TRUST UNDER WILL OF PHILIP SHAPIRO; and MARTIN ROSEN, in his capacity as Trustee of the Trust Under Will of Philip L. Shapiro,

Defendants.

CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures shall be due: September 15, 2014.
- 2. Fact Discovery shall be completed by: February 5, 2015.
- 3. The Disclosure of Case-in-Chief Experts shall be due: June 12, 2015.
- 4. The Disclosure of Rebuttal Experts shall be due: July 17, 2015.
- 5. The Deadline for Completion of Expert Discovery shall be: October 9, 2015.
- 6. The Deadline for Service of a Notice of Mediation Referral shall be: On or before December 4, 2015.
- 7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before December 18, 2015.
- 8. The Deadline for Conclusion of Mediation shall be: On or before April 15, 2016.

Dated: New York, New York June 17, 2014

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona
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